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Remarks

Applicant respectfully traverses the Section 102(b) rejection of claims 1-15 because the Examiner cites to portions of the Cassetti reference that teach setting a bit of an internal TAP link module (TLM), not resetting a bit in a TAP (test access port) controller as in the claimed invention. For the reasons and arguments set forth below, Applicant respectfully resubmits that the claimed invention is allowable over the cited reference(s).

The Office Action dated April 2, 2007 indicated that claims 1-15 stand rejected under 35 U.S.C. § 102(b) over Cassetti *et al.* (U.S. 6,311,302).

Applicant respectfully traverses the Section 102(b) rejection of claims 1-15 because the Examiner fails to cite prior art that corresponds to all of the claimed limitations, including those directed to setting a bit in a TAP controller. Regarding independent claim 1, the Examiner appears to be confusing a TLM with a TAP controller. As apparent from the Applicant's Specification (*see e.g.*, paragraph 0024) and the teachings of the Cassetti reference (*see e.g.*, Figure 1), one skilled in the art would recognize that a TLM is not equivalent to a TAP controller. As such, the Examiner fails to cite to any portion of the Cassetti reference that corresponds to claimed limitations directed to resetting a first bit to a known state in each of a plurality of TAP controllers. The cited portions of the Cassetti reference teach setting the extension bit at cell 22 of the internal TLM of core 12; however, the cell 22 is not part of either of TAP controllers 16 or 18 as is clearly shown in Figure 1. The Examiner does not cite to any portion of the Cassetti reference that teaches resetting a bit in a TAP controller. As such, Applicant submits that these cited portions of the Cassetti reference fail to correspond to claimed limitations directed to resetting a first bit in each of a plurality of TAP controllers to a known state and further fail to correspond to producing a first signal based at least in part on the state of the first bits. Accordingly, the Section 102(b) rejection of claim 1, as well as the rejection of claims 2-11 that depend from claim 1, is improper and Applicant requests that it be withdrawn.

Regarding independent claim 12, the Examiner fails to cite to any portion of the Cassetti reference that corresponds to claimed limitations directed to each of the plurality of TAP controllers having at least one switch bit and the routing logic selectively

connecting to one of the plurality of TAP controllers based at least in part on the state of the switch bits. The cited portions of the Cassetti reference concern storing instructions in an internal TLM that is separate from the TAP controllers 16, 18, 30 and 32 (*see, e.g.*, Figure 1; Col. 3:20-37; Col. 4:41-45; and Col. 6:1-10). The Examiner asserts that the cells 22 and 36 of the internal TLMs and the TLM registers 20 and 34 of the internal TLMs correspond to the claimed switch bits; however, the internal TLMs are not part of any of TAP controllers 16, 18, 30 and 32 as is clearly depicted in Figure 1. As such, the cited portions of the Cassetti reference do not correspond to the claimed switch bits which are part of the TAP controllers (*see* paragraph 0024 of Applicant's Specification for further discussion regarding the difference between a TLM and a TAP controller). Thus, Applicant submits that the Examiner further fails to cite to any portion of the Cassetti reference that corresponds to the routing logic selectively connecting to one of the plurality of TAP controllers based at least in part on the state of the switch bits as claimed in claim 12. Therefore, the Section 102(b) rejection of claim 12, as well as the rejection of claims 13-15 that depend from claim 12, is improper and Applicant requests that it be withdrawn.

Applicant further traverses the Section 102(b) rejection of claims 1-15 because the Examiner has improperly pieced together portions of different portions of the cited Cassetti reference without showing how these portions work together to arrive at the claimed limitations. Section 2131 of the M.P.E.P. states that "the identical invention must be shown in as complete detail as is contained in the ... claim" (citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1239 (Fed Cir. 1989). M.P.E.P. § 2131 further states that various portions of a reference cannot be asserted together to anticipate a claim unless the reference arranges the limitations as they are arranged in the claim.

The Examiner cites to various portions of the Cassetti reference as allegedly corresponding to several of the claimed limitations. *See, e.g.*, Figure 1, Col. 3:6-19, Col. 6:1-10 and Col. 4:53-65. The Examiner then cites to the Background of the Cassetti reference as supposedly corresponding to claimed limitations directed to producing a first signal based at least in part on the state of the first bits in the TAP controllers. *See, e.g.*, Col. 2:21-50. As is indicated by the Cassetti reference, this portion of the Background is discussing teachings of U.S. patent application, Ser. No. 09/283,171. *See, e.g.*, Col. 2:30-

37. Thus, the Examiner appears to be citing to the teachings of two different references. The Examiner has not provided any rationale for combining these references or shown how such a combination could function. In failing to cite any portion of the Cassetti reference that shows all of the limitations arranged as claimed in the instant application, the Examiner has failed to show correspondence to the claimed limitations in a manner consistent with M.P.E.P. § 2131. In this regard, the Examiner fails to provide correspondence to the claimed limitations and the Section 102(b) rejection of claims 1-15 should be withdrawn.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063.

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